

Talking Points:

U.S. House of Representatives Committee on Transportation & Infrastructure

Subcommittee on Economic Development, Public Buildings, and Emergency Management

Feb 24, 2006

Catastrophic Planning:

Funding and staff will always be an issue when States are “asked” (required in order to receive federal funding) to expand existing programs and/or add new ones. Historically, FEMA and the States have taken an “all-hazards” approach to incident planning, and with a few exceptions (notably Hurricanes Katrina and Rita) this approach has worked quite well.

The Missouri State Emergency Operations Plan was developed in accordance with the FEMA State and Local Guide (SLG) 101 (Guide for All-Hazard Emergency Operations Planning – Sept 1996). Additionally, we have ensured that during annual updates the SEOP has met the changing requirements of the State and the additional requirements associated with the National Incident Management System (NIMS) and the National Response Plan (NRP).

We have just completed a review of our existing SEOP in conjunction with the U.S. Department of Homeland Security Nationwide Plan Review. This was a most productive and enlightening experience. While our SEOP meets ALL of the existing guidelines established by SLG 101, it does not have the level of detail outlined in the checklist used by the peer review team. FEMA must update the SLG 101 to reflect the level of detail desired in a State and/or local emergency operations plan.

The event that would have the most catastrophic impact on the State of Missouri would be a natural disaster, an earthquake along the New Madrid Seismic Zone. Scientists and other experts from the Central United States Earthquake Consortium (CUSEC) have predicted that there is a 25 – 40 % chance of a magnitude 6.0 or greater earthquake within the next 50 years and about a 7 – 10 % chance of a repeat of the 1811 – 1812 earthquakes (approx magnitude 7.5) in the same time period.

As a result of lessons learned from the Gulf Coast hurricanes, a catastrophic event planning group was formed to develop and test plans for the response to and recovery from a catastrophic earthquake along the New Madrid Seismic Zone. This group is composed of subject matter experts from Federal, State, Local, and Non-Governmental Organizations.

Lack of DHS Funding for the “All Hazards Approach” to Emergency Planning

The following was submitted to the Department of Homeland Security, Office of Domestic Preparedness in November 2005. This request was denied because the scenario did not include a “terrorism element.” This was just another case of “ODP double-speak,” ODP professes, “all hazards planning” throughout the FY2005 grant guidance but refuses to fund the “all hazards approach.” We have asked permission on this same subject in early summer 2005, but were also turned down for the same reason. We thought that after all the Katrina related problems were brought to light our request would be approved would be approved

The State of Missouri requested permission to use FY2005 State Homeland Security Program grant funds to support Missouri’s participation in the scheduled exercise to be conducted in the spring of 2007 called the U.S. Coast Guard Spill of National Significance (SONS) exercise. The scenario revolves around a large-scale earthquake incident within the New Madrid fault system. This scenario falls within the scope of one of the fifteen National Planning Scenarios addressed in Homeland Security Presidential Directive #8, within the FY2005 Homeland Security Grant Program guidance. The Department of Homeland Security is one of the major participants in the SONS exercise planning development.

Funds will be used for Missouri’s participation in all aspect of the exercise (preplanning, conduct/participation and, after-action reporting. Additionally the state will need to review and update earthquake plans and contract with specialists in the earthquake arena to validate our planning process. The information provided below provides a brief overview of the exercise. Initial planning for this exercise started November 9, 2005 in St. Louis, Missouri.

This is a monumental under-taking that will include over 50 counties within the state of Missouri and numerous state agencies, federal agencies and other states that fall within the New Madrid Fault Zone. In light of current catastrophic events it is imperative that the State of Missouri continues not only participation in this exercise program, but continuation in the planning process for what is considered not only Missouri’s “worst-case events but for all the other states in the Central Region.

SONS 2007 Exercise:

The Department of Homeland Security, U.S. Coast Guard, U.S. Environmental Protection Agency, Federal Emergency Management Agency, Central U.S. Earthquake Consortium (CUSEC), the American Petroleum Institute, the U.S. Army Corps of Engineers, and the Pipeline and Hazardous Materials Safety Administration/Department of Transportation are lead planners for developing the next SONS exercise in calendar year 2007 for the central United States.

In the event of a large-scale earthquake incident within the New Madrid fault system, located within the Mississippi River Valley, numerous emergency response issues would come into play. These include oil and hazardous substance releases from numerous pipelines, facilities, and barges; bridge failures; impacts to road, rail, and water transportation; potential flooding from levee failures; urban search and rescue; and population protection. Additionally, there are many overlapping authorities, jurisdictions, and competing response priorities, which highlight the need to use the National Response Plan (NRP) to streamline and coordinate federal response to the emergency. The Spill of National Significance 2007 Exercise (SONS 07) is being designed to improve the nation's preparedness for such a scenario.

Planning & Training Requirements:

The U.S. Department of Homeland Security and the Federal Emergency Management Agency continue to place an increasing number of "recommendations" (requirements) on state and local governments. It is becoming increasingly difficult to meet these new requirements and still conduct our day-to-day emergency management operations.

Some of the new requirements include:

- Compliance with the National Incident Management System (NIMS) and the National Response Plan (NRP).

- Training associated with the National Incident Management System (NIMS) and the National Response Plan (NRP).

- Catastrophic event planning.

- Participation in the National Incident Management Capability Assessment Tool.

Some of the pre-existing requirements include:

- Development and maintenance of state and local all-hazard emergency operations plans.

- Development and maintenance of state and local hazard mitigation plans.

- Development and participation in regional, state, and local exercises.

- Development and submission of various grant proposals.

All of these are, in one form or another, tied to funding. When volunteers administer local emergency management programs, it falls upon the state to provide assistance in meeting these requirements. With reduced budgets and staffing, the situation will quickly change from "When do you want this done?" to "What don't you want done?". That is not a choice that any of us want to make when it comes to life-safety issues.

Impact of Proposed Reduction in Emergency Management Performance Grant (EMPG) Funds:

If this cut is realized Missouri will be required to reduce our Emergency Management Performance Grant (EMPG) budget by approximately 8%. This would create a hardship on the agency, since the Missouri Emergency Management Agency (SEMA) is also the State Administering Agency for Homeland Security funding.

The SEMA in Missouri has 34 fulltime funded EMPG employees. We have had to use existing SEMA employees to manage Homeland Security funds in addition to their already heavy workload. Homeland Security funds provide administrative funds, but not for existing Public Safety Employees, so EMPG funded employees were given additional duties as assigned.

Employees in the Training, Fiscal, Planning, Operations sections, as well as our Director, and Deputy director have all had to work on homeland security issues as well as their current duties. This will require us to reduce our staff by at least four employees or cut the funding to Local Emergency management Agencies that participate in EMPG program.

This budget proposal will devastate state and local emergency management programs, and consequently the emergency response system. Without adequate numbers of state and local personnel to operate the emergency management system, the infrastructure used to prevent, prepare for, respond to and recover from all disasters and emergencies will be greatly reduced.

DHS timelines for the FY2006 grant submission:

Guideline for the FY2006 grant application was provided to the states in the online Grant Management System (GMS) after 7:00 pm on Friday, December 2, 2005. States were then given until March 2, 2006 to submit their applications. Under the previous rules for grant applications this was no problem and the expectations were practical. It should be noted that with the FY06 grant program guidance was over a thousand pages that had to be reviewed.

The FY2006 grant process is an entirely new program; it is based upon a baseline allocation, a risk-based allocation and a need-based allocation. States only have input on the needs based portion of the application. We are required to address the Interim National Preparedness Goal, seven National Priorities and eight target priority target capabilities. This required the states to conduct a Capability Review, a Program Capability and Enhancement Plan and an Investment Justification Plan, all within a ninety-day period. This required a “re-education of all personnel involved in process concerning Target Capabilities Lists, the National Goal and the National Priorities and the grant writing process. The short timelines are constantly a source of irritation between the states and DHS, they continue to call us “stakeholders,” but refuse to listen to our inputs.

Grant evaluation criteria offered to the states in the grant guidance were limited to one paragraph on page 60/61. G&T Information Bulletin, No. 202, dated February 8, 2006 provided 15 additional pages of guidance to the states, four pages contained additional criteria for the evaluation process. While we appreciate the information but our over-bearing questions is, “why wasn’t this provided with the grant application guidance on December 2, 2006 or at least with the DHS Technical Assistance provided to the State of Missouri on December 15, 2005?” This very important guidance is being provided to the states only 20 calendar days prior to submission to DHS is irresponsible.

The states are expected to stay within timelines but how can they do so without all the applicable information. Any successful grant writer will tell you that the grant is written to the evaluation criteria. Everything that has been developed over the last thirty days will have to be “flushed out” against the criteria. We will get it done, but you can only hammer people so long before they quit (this includes your professionals and volunteers at the state and local level), with this additional guidance the states should be given more time to submit applications.

Conclusion:

If the U.S. Department of Homeland Security and/or FEMA intend to place additional planning or operational requirements on the states, they must ensure that their funding programs complement those requirements and not hinder them.